

1887-013 Chancery Causes: William M. Young vs. William D. Jones  
Lee Co.

CA-Debt

T-Property



To The Hon. H. S. K. Morison  
Judge of the Circuit Court of  
Lee County Virginia:

Your orator William M. Young  
who humbly complaining  
would respectfully represent  
that heretofore to wit, on or  
about the 25<sup>th</sup> day of May  
1887, your orator sold to one  
Wm D. Jones, a valuable  
tract of land at the price of  
\$10,000<sup>00</sup>, a part of which  
was paid him at the time,  
and about \$2000.<sup>00</sup> of which  
there is now judgement or decree  
upon, in this Hon. Court on  
the Chancery side thereof, against  
said Jones and others. The  
residue is evidenced by bonds,  
one of which is for \$3000.<sup>00</sup>  
and is due & payable after  
two years, and dated May 25<sup>th</sup>  
1887; the other for a like sum  
and dated on same day is  
payable after three years and  
each bears interest from  
their date. There has not  
any thing been paid on  
either of these bonds, but



Your crator concedes that said Jones is entitled to one half the amount he the said Jones paid H. S. Kane and others to compromise three ejectment suits, against Your crator and others, which is according to said Jones statement to your crator \$600.<sup>00</sup> being half the amount paid. The residue is justly owing to your crator & will fall due at the times stated. These two bonds, marked one & two will be forwarded herewith as part hereof.

The said Jones is a non-resident of this Commonwealth but has estate, in land, in this County, of which he is the owner in fee. He owns the tract purchased of your crator situated in this County in what is known as the Wild Cat valley wherein your crator resides, the number of acres not known, and for a more particular description of which reference is here made to the deed to said Jones by your crator now of record in this



County.

He also cures a tract purchased from J. P. Kane in the same neighborhood, and for a particular description of which reference is here made to the said deed, and title papers of the said Jones - This tract is known as the Penellten tract and is the same whereon Dale W. Legg now resides -

He also cures a tract, purchased from Mr. E. Hyatt, on Penellten river, adjoining the Canal of L. C. Clinger and others, and for a particular description of which reference is here made to the deed & title papers of said Jones now of record in the Clerk's office of Lee County Virginia -

Your orator is informed, and believes that said Jones is now endeavoring to sell and mortgage or convey by deed of trust all his property in this County, so that there will not be left of his property sufficient to pay the same should the ordinary



process of law be used to  
collect the same. He the said  
Jones, is also the owner of an  
other tract of land purchased from  
Harvey Young and one R. A. Ayers  
situated in this County consisting of  
1000 acres purchased from G. W. Young  
by them, situated on the South side of  
Wallins Ridge and North side of Pow-  
els mountain, on the waters of  
Levelady Creek, adjoining the lands  
of D. S. Litten and others, and for  
a more particular description of  
which reference is made to the  
deed of G. W. Young to said Harvey  
Young & Ayers now of record in  
the clerks office of Lee County  
Virginia - The said Jones owns  
an other tract adjoining the last named  
of 100 acres purchased from the  
said Young (Harvey) and R. A. Ayers  
and for a more particular descrip-  
tion of which reference is here  
made to said Jones deed and title  
papers. Also an other tract, pur-  
chased from said Harvey Jones, and  
R. A. Ayers consisting of 240 acres and  
reference to which is here made to



said Jones deeds and title papers  
now of record in the clerk's office  
copies of which said deeds will  
in due time be filed with this  
bill, showing specifically the  
meters and bounds thereof.

The object of this bill therefore is  
to attach upon the lands in this bill  
mentioned and hold the same for the  
payment of the debt herein men-  
tioned, and on a hearing to have  
a decree rendered, in favor of  
your orator for the amount found  
due him, and to have so much  
of said land sold as will  
pay and discharge the same.

The premises considered therefore  
your orator prays that Wm D.  
Jones be made a party defend-  
ant to this bill, and answer the  
same, but to do so on oath is  
expressly waived by your orator  
and that on a hearing, a decree be  
rendered in favor of your orator  
for the amt due him and that said  
land or so much thereof be sold as will  
pay or discharge the same - And for all  
other further and general relief may  
Supra issue &c.

A. L. Pickens  
for plff.



Wm M. Young

r } Bill Chip

W. D. Jones et al



Virginia Lee County to wit.  
This day w<sup>m</sup> M. Young  
personally appeared before  
me the undersigned and  
made oath that w<sup>m</sup> D. Jones  
is justly indebted to him  
in the sum of six thousand  
dollars <sup>with interest from 25<sup>th</sup> May 1887</sup> \$3000.00 which is  
due and payable 25<sup>th</sup> day  
of May 1889, and is due by  
bond after two years, and  
dated, May 25 1887. The  
residue \$3000.00 will become  
due and payable after  
three years, for three thousand  
dollars and dated May 25 1887  
And these sums are justly  
due and payable at the times  
stated; and subject only  
to a credit of only of  
about \$600.00 in settlement  
for compromise of the eject-  
ment suit, by H. S. Kane et al  
against affiant and others  
in the Circuit Court of Lee  
County, and which matter is  
yet unsettled, and which af-  
fiant believes does not ex-  
ceed the said sum of six



hundred dollars. And affiant  
further states that said Jones is  
a non resident of the State of  
Virginia and that he has estate  
belonging to him in the County  
of Lee, viz lands, and affiant  
is informed and believes, that  
said Jones is now endeavoring  
to transfer by sale or deed of  
trust said lands so that he  
the said Jones will not prob-  
ably have sufficient effects  
in said State of Virginia to  
pay the same should only the  
ordinary process of law  
be used to obtain said judg-  
ment on said sum. So does  
affiant as aforesaid.

J. A. Stogatt Clerk